

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
) No. 13-CR-10200-GAO
v.) **FILED UNDER SEAL**
)
DZHOKHAR TSARNAEV)

**ASSENTED-TO MOTION FOR EXTENSION OF TIME (ONE WEEK)
TO FILE IN LIMINE *DAUBERT* MOTION REGARDING
TAPE, POLYMER AND FABRIC MATCHES**

Defendant, Dzhokhar Tsarnaev, by and through counsel, with the assent of the government, respectfully requests leave to file a motion in limine arguing exclusion of certain tape, polymer, and fabric matches by one week, to December 12, 2014. As grounds therefore, defendant states that a brief additional period is necessary to draft and file the motion as (a) the defense has been drafting and is today filing a number of motions in accordance with the Court's deadline for pretrial and scientific/*Daubert* motions in limine, (b) issues surrounding the expert opinion regarding tape, polymer, and fabric matches are scientifically and legally complex, (c) an expert for the defense has only lately become available to consult about the issues and will need time to review additional materials before consulting, and (d) the government has indicated that additional discovery responsive to a defense request regarding testing is forthcoming this day.

For the foregoing reasons, defendant requests an additional one week period in which to file a *Daubert* motion in limine.

Respectfully submitted,
DZHOKHAR TSARNAEV

By his attorneys



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Certificate of Service

I hereby certify that this document was served on counsel for the government by email and paper copy by interoffice delivery on December 5, 2014.



Timothy Watkins